# THE COMMONWEALTH OF MASSACHUSETTS OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

## DEPARTMENT OF TELECOMMUNICATIONS & ENERGY

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May 11, 2004

BETH LINDSTROM

DIRECTOR

OFFICE OF CONSUMER AFFAIRS

AND BUSINESS REGULATION

SENT BY E-Mail, and First Class U.S. Mail

Thomas P. O'Neill, Esq. KeySpan Energy Delivery 52 Second Avenue Waltham, MA 02451

Re: Boston Gas Company, D.T.E. 04-16

Dear Mr. O'Neill:

Enclosed is the first set of information requests by the Department of Telecommunications and Energy to Boston Gas Company regarding the above-captioned matter. Please submit copies of the Company's responses to the information requests to the Department by 5:00 p.m., May 25, 2004.

Should you have any questions please contact me at (617) 305-3762. Thank you for your prompt attention to this matter.

Sincerely,

Jody Stiefel Hearing Officer

Enc.

cc: Service List

Mary Cottrell, Secretary

FAX: (617) 345-9101 TTY: (800) 323-3298 <u>www.mass.gov/dpu</u>

### FIRST SET OF INFORMATION REQUEST OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO BOSTON GAS COMPANY

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Boston Gas Company ("Boston" or "Company") the following information request(s) with respect to the March 1, 2004 Service Quality ("SQ") Report, ("Filing") D.T.E. 04-16.

#### **INSTRUCTIONS**

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

- 1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
- 2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
- 3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
- 4. The term "provide complete and detailed documentation" means:
  - Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
- 5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills,

- checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
- 6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
- 7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department, one copy to the Service List, and three copies of the responses to Jody M. Stiefel, Hearing Officer.

#### Requests

- DTE 1-1 Refer to the Company's Filing at Section 2 Historical Performance Data.
  - (a) Please comment upon the increase from 320 consumer division cases reported in 2002 to the 516 consumer division cases recorded in 2003. What led to this change?
  - (b) Please comment upon the increase from \$10.20 per 1,000 customers in consumer division bill adjustments reported in 2002 to the \$54.53 per 1,000 customers level recorded in 2003. What led to this change?
  - (c) Please comment on the reduction from 3.14 percent in unaccounted for gas recorded in 2002 to the 1.81 percent level reported in 2003. What led to this change?
- DTE 1-2 Please explain how the Company calculates the number of responses to Odor Calls. Specifically, if the Company receives more than one call regarding the same odor source, does the Company count this as one call or as multiple calls?